

Navy's Draft Environmental Impact Statement: Comments & Talking Points

The Navy's DEIS does not adequately address the true environmental and public health consequences of planned Growler increases.

- **Toxic Noise:** The Navy wants to move ALL touch-and go Growler operations to the OLF. Operations would be increased up to 35,000 a year! The DEIS misrepresents the impacts of Growler noise. No measurements of noise were taken in communities – only computer modeling that averaged periods of noise with long periods of silence.
- **Health harms;** The DEIS ignores overwhelming scientific and medical evidence of harms caused by hazardous Growler noise. Growler noise has already created what one health expert labeled a "public health emergency that is literally killing people..."
- **Children and Education:** The DEIS states that increased Growler operations will cause "between 45-55 disruptions per HOUR in the Coupeville Schools". And, children may experience some cognitive damage due to increased noise.
- **Property Values:** Options being considered by the Navy would subject properties from Engle Road and western Coupeville east to Saratoga Passage and from Penn Cove on the north to Puget Sound to inclusion in an Accident Protection Zone (APZ) 1 or 2. *Property values will plummet.* Even worse, all those APZ properties and many more beyond are in a Noise Zone 2 area, within which Island County may deny residential development.
- **Drinking Water Pollution** Coupeville's water supply well next to the OLF is contaminated with the Navy's toxic chemicals at concerning levels. An accident at the OLF could cause more contamination. Increasing operations by Navy Growlers will increase the threat to Coupeville's drinking water.
- **Electronic Warfare:** Nowhere do any Navy NEPA documents from the last 7 years discuss the risk of exposure to chronic downward-directed radiation from weaponized forms of directed energy aboard Growlers, to civilians, wildlife and habitat. OLF has a stationary electromagnetic emitter currently in use. Why is any mention or discussion of risks from exposure to electromagnetic radiation from Navy jets completely missing from all discussions of potential impacts?

The draft EIS does not comply with mandatory NEPA requirements to fully analyze off-Whidbey training options (alternatives) for conducting touch and go practice. In a report of 1500 pages (over the NRPA recommended 300 pages) the Navy has submitted an unreadable document short on data and facts.

You can make your comments at the Navy's public meeting or submit them by email before January 25. Fill out the comment form at <http://www.whidbeyeis.com>.

**To find out more about the threat to our community and what you can do visit:
<http://citizensofebeysreserve.com>.**

What can YOU do right now?

- Attend the December 9th Navy Open House meeting at Coupeville High School Commons 4-7 pm and bring 3 people
- Submit comments on the EIS and send a copy to our group by emailing us at coupevillecommunityallies@gmail.com You may submit comments more than once. **There are FOUR ways to provide comments:**
 1. Fill out a comment sheet and drop it in the comment box at the open house public meeting on Dec. 9th.
 2. Provide verbal comments at the public meeting on Dec. 9.
 3. Mail your comments to: EA-18G EIS Project Manager, Naval Facilities Engineering Command (NAVFAC) Atlantic – Attn: Code EV21/SS, 6506 Hampton Blvd., Norfolk, VA 23508
 4. Provide written comments using the EIS form on [this website](#)
- ✓ **Help COER fight the big legal battles ahead: Send your contribution to: COER. P.O. Box 202, Coupeville, WA 09293.**
- ✓ **Sign the petition: https://www.change.org/p/jay-inslee-governor-inslee-give-citizens-a-voice-in-military-expansion-in-the-salish-sea?recruiter=361023820&utm_source=share_petition&utm_medium=facebook&utm_campaign=autopublish&utm_term=des-lg-no_src-reason_msg**
- ✓ **Contact your elected Representatives.**

Contact Your Representatives

Governor Jay Inslee

Office of the Governor PO Box 40002 Olympia, WA 98502-0002
Call (360) 902-4111, Fax (360) 753-4110

Senator Patty Murray

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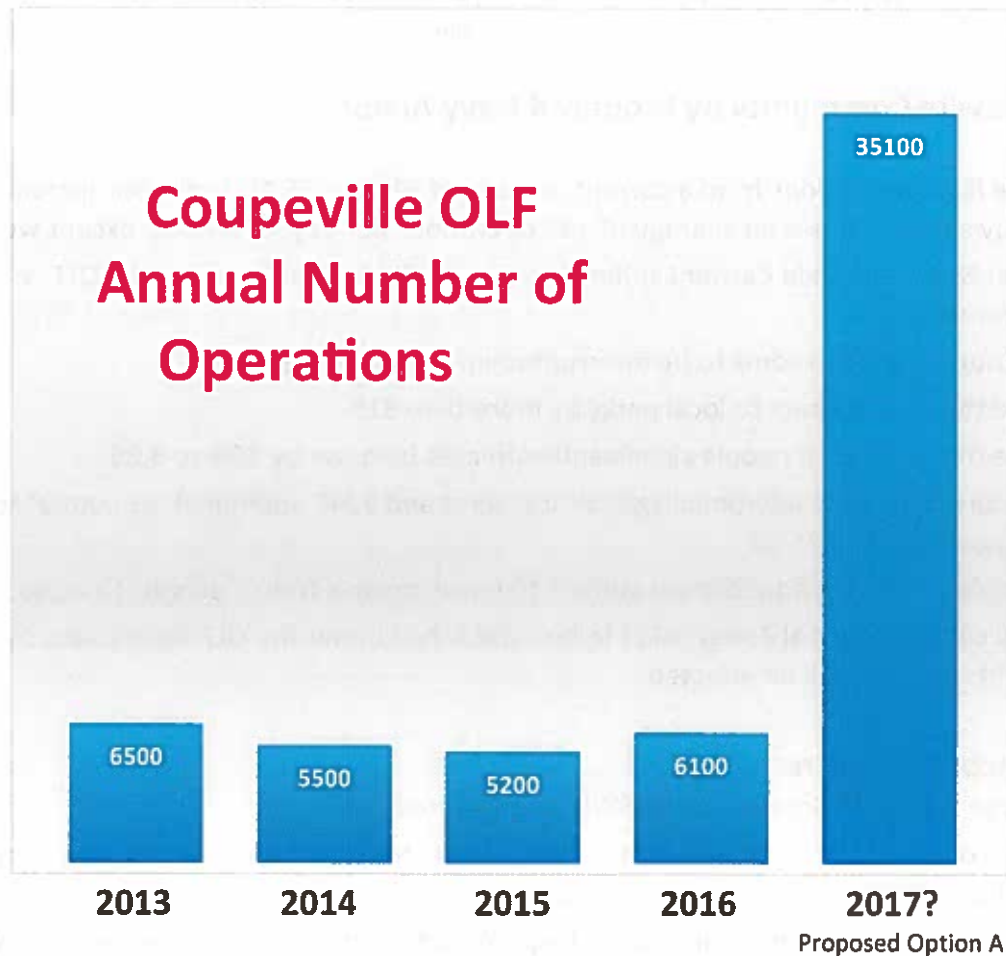
Congressperson Rick Larsen

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Island County Commissioners

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Helen Price Johnson, Office Phone: (360) 679-7354, Email: district1@co.island.wa.us
Jill Johnson, Office phone: (360) 679-7354, Email: district2@co.island.wa.us

Coupeville OLF Annual Number of Operations



What Can You Do?

- ❖ Provide comments on the Draft EIS online at whidbeyeis.com. The deadline for comments is January 25th
- ❖ Call (best), email, or write your elected officials. You may call daily – number of calls are important. Email and postal addresses may be found at the Coupeville Community Allies (CCA) Facebook page.
 - Governor Jay Inslee: 360.902.4111; governor.wa.gov
 - U.S. Senator Patty Murray: 206.553.5545; www.murray.senate.gov
 - U.S. Senator Maria Cantwell: 425.303.0114; www.cantwell.senate.gov
 - U.S. Congressman Rick Larson: 800.652.1385; rick.larsen@mail.house.gov
 - Island County Commissioner, District 1, Helen Price-Johnson: 360.679.7354; district1@co.island.wa.us
 - State Representative, 10th District, Norma Smith: 360.786.7884; norma.smith@leg.wa.gov
 - State Senator, 10th District, Barbara Bailey: 360.786.7618; barbara.bailey.leg.wa.gov
- ❖ Sign the online petition to our elected officials. This is easiest to access from the CCA Facebook page. Or type <http://bit.ly/2gZwR5Q> into your browser.

Growler Expansion Effects at OLF Coupeville

By Coupeville Community Allies

Impacts to Coupeville Community by Proposed Navy Action

The preferred plan:

- ❖ Will increase flight operations from a current average of 6100 to 35,100 per year, increasing current operations by six-fold. This is an average of 135 operations per day, every day, except weekends.
- ❖ Specifies that 80% of all Field Carrier Landing Practice (FLCP) be conducted at the OLF, vs. 20% at Ault Field (Oak Harbor)
- ❖ Will cause Coupeville classrooms to be interrupted up to 5 times per hour.
- ❖ Will increase the noise impact to local parks by more than 91%
- ❖ Will increase the number of people significantly affected by noise by 76% to 3,865
- ❖ Will affect more than 1183 additional agricultural acres and 2243 additional residential acres with average sound levels greater than 75 dB
- ❖ Will increase commercially zoned areas subject to noise impacts from 1 acre to 11 acres.
- ❖ Will cause Accident Potential Zones (APZ) to be established under the OLF flight patterns. Land use and property rights in APZ's will be affected.

EIS Points of Concern to Address

1. Alternatives to basing all Growlers at NASWI not evaluated.
2. National Environmental Policy Act (NEPA) requires an EIS to be less than 300 pages if "unusually complex". The draft EIS is more than 1500 pages.
3. Noise modeling is outdated, noise averaging inappropriate. Actual noise measurements were not made. Measurements made in by the NPS show noise levels far in excess of that predicted by the modeling.
4. Use of DNL noise averaging criteria not appropriate for military flight operations.
5. Jet noise reduction measures not thoroughly considered.
6. Crash frequency not addressed.
7. APZ not established now, as required & effect of establishing APZ not addressed.
8. Childhood learning disability & hearing damage not addressed sufficiently.
9. Impact on students at Coupeville Middle and High Schools not addressed.
10. Impact on children at play at Rhododendron Park not addressed.
11. Economic impact on tourism, property value loss, decline of population, loss of businesses, not addressed adequately.
12. Impact to avian migration, habitat & wetland species near shorelines not addressed.
13. Effect on Ebey's Landing National Historical Reserve, including tourism, cultural landscape, soundscape, and natural resources not addressed.
14. Water quality degradation potential to sole-source aquifer not addressed.
15. Frequency and effects of fuel dumping not addressed.

To Learn More

- ❖ Follow us on Facebook at Coupeville Community Allies
- ❖ To receive email updates email us at coupevillecommunityallies@gmail.com.
- ❖ Review the Draft EIS and appendices at www.whidbeyeis.com

Draft Environmental Impact Statement for EA-18G "Growler" Airfield Operations at Naval Air Station Whidbey Island Complex

January, 2017 Comments

Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.

Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).

2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.

Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.

3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide "scientifically and legally defensible noise assessments" of the modern, high-thrust jet engines used in the Growlers.

Action: Redo the noise simulation using the more recent Advanced Acoustic Model.

4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.

Action: Noise levels should only be averaged over active flying days.

5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.

Action: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."

6. The Draft includes some independent noise measurements and ignores others.

Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.

7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."

Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.

12. Add your own comments here:
